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VIA EFILING

May 30, 2008

Mr. Charles L.A. Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Center Dr., Suite 100
Columbia, SC 29210

Re: **Rulemaking Regarding Stretcher Vans - Notice of Drafting Filed with the South Carolina
Legislative Council
Docket No. 2007-445-A**

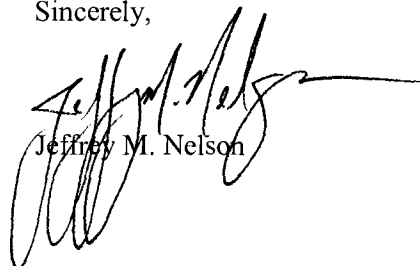
Dear Mr. Terreni:

The Office of Regulatory Staff ("ORS") files the enclosed comments regarding the proposed new regulations governing Stretcher Vans which were submitted by the Public Service Commission to the South Carolina Legislative Council for publication in the State Register on April 11, 2008.

Under the current broker operated Medicaid transportation system managed by DHHS, any Medicaid recipient who is non-ambulatory is transported by ambulance. Many of these patients transported by ambulance are in medically stable condition and have no serious or life-threatening medical condition. They are many times simply unable to be transported in an upright position. The adoption of this regulation in no way restricts or prohibits DHHS or its contractors from providing ambulance transportation to those Medicaid recipients who require such services and will additionally offer all South Carolinians a lower cost option for non-ambulatory and non-emergency transportation.

ORS understands that certain carriers, organizations or entities may object to the language contained in Regulation 103-133(7)(C)(2). That sub-section provides instruction to stretcher van operators in the event of a passenger having a medical emergency while being transported in a stretcher van. While ORS believes that the language and instructions provided in this sub-section of the regulation are adequate and proper, ORS would have no objection to this portion of the regulation being deleted by the Commission if doing so would satisfy the objections of other parties and thereby provide for the adoption of the remainder of Regulation 103-133(7).

Sincerely,



Jeffrey M. Nelson